

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

HAYWARD INDUSTRIES, INC.,

Plaintiff,

v.

Civil Action No. 3:20-cv-00710-MOC-SCR

BLUEWORKS CORPORATION,
BLUEWORKS INNOVATION
CORPORATION, NINGBO C.F.
ELECTRONIC TECH CO., LTD.,
NINGBO YISHANG IMPORT AND
EXPORT CO., LTD.,

Defendants.

**REPLY IN SUPPORT OF DEFENDANTS' MOTION FOR
USE OF AN INTERPRETER AT TRIAL**

Contrary to Plaintiff's papers, Defendants do not seek an interpreter for the entire trial of this matter. Rather, as expressly stated in their motion, Defendants request only the Court's permission for an interpreter to attend the trial to assist Mr. Chen in fully understanding the proceedings, and with his trial testimony as needed. To the extent that Plaintiff intends to question Mr. Chen at trial, they will control the timing of that testimony. Accordingly, the time it takes to interpret Plaintiff's questions and Mr. Chen's responses to those questions is appropriately taxed on Plaintiff, with the time that it takes to interpret Defendants' questions and Mr. Chen's responses to those questions appropriately taxed to Defendants.

The continuance of this trial by three days was not a jointly requested continuance; rather, that request was made by the Plaintiff and not opposed by Defendants, who accommodated

Plaintiff's schedule. Defendants' agreement to Plaintiff's request was further made based on Plaintiff's agreement that the time for trial would be shared equally.

WHEREFORE, Defendants request that the Court grant Defendants' Motion for a Chinese Interpreter for use at the upcoming trial in order to assist the Defendants' witness Mr. Zefeng (Richard) Chen.

Dated: February 5, 2024

Respectfully submitted,

/s/ Christina Davidson Trimmer

Christina Davidson Trimmer (N.C. Bar No. 44857)

Shumaker, Loop & Kendrick, LLP

101 South Tryon St., Suite 2200

Charlotte, North Carolina 28280-0002

Tel: (704) 945-2151

Fax: (704) 332-1197

Email: ctrimmer@shumaker.com

Jennifer Seraphine (*pro hac vice admitted*)

Keeley Vega (*pro hac vice admitted*)

Jacob Zweig (*pro hac vice admitted*)

Turner Boyd Seraphine LLP

155 Bovet Road, Suite 750

San Mateo, California 94402

Tel: (650) 521-5930

Fax: (650) 521-5931

Email: seraphine@turnerboyd.com

Email: vega@turnerboyd.com

Email: zweig@turnerboyd.com

Michelle C. Dunn

Platinum Intellectual Property

3031 Tisch Way, Suite 110 PW

San Jose, CA 95128

Tel: 404-800-5884

Fax: 877-463-0654

Email: michelle.dunn@platinum-ip.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2024, the foregoing document was served on all counsel of record using the Court's CM/ECF system, which will send notification of such filing to any CM/ECF participants.

Respectfully submitted,

/s/ Christina Davidson Trimmer

Christina Davidson Trimmer (N.C. Bar No. 44857)
Shumaker, Loop & Kendrick, LLP
101 South Tryon St., Suite 2200
Charlotte, North Carolina 28280-0002
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Fax: (704) 332-1197
Email: ctrimmer@shumaker.com